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2014-L-012038
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~~LIN~~ CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
LAW DIVISION
CLERK DOROTHY BROWN

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GERTRUDE GLASPIE
Plaintiff,

. V .

CHARLES DEHAAN individually,
CHARLES DEHAAN as an agent and employee
of HOUSECALL PHYSICIANS GROUP OF
ROCKFORD, S.C., HOUSECALL; HOUSECAL
PHYSICIANS GROUP OF ROCKFORD, S.C.
CHARLES DEHAAN as an agent and employee
of HOUSECALL PHYSICIANS GROUP OF
ILLINOIS, S.C.; HOUSECALL PHYSICIANS
GROUP OF ILLINOIS, S.C.; CHARLES
DEHAAN as an agent and employee of
MD@HOME MANAGEMENT, LLC;
MD@HOME MANAGEMENT, LLC

Defendants.

No:

COMPLAINT

NOW COMES Plaintiff, GERTRUDE GLASPIE, by and through her attorney, THE LAW OFFICES OF MICHAEL J. GRAVLIN, LLC., and complaining against the Defendants, CHARLES DEHAAN, CHARLES DEHAAN individually, CHARLES DEHAAN as an agent and employee of HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C., HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C.; CHARLES DEHAAN as agent and employee of HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.; HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.; CHARLES DEHAAN as an agent and employee of MD@HOME MANAGEMENT, LLC; MD@HOME MANAGEMENT, LLC, and states as follows:

COUNT I ASSAULT/BATTERY CHARLESS DEHAAN INDIVIDUALLY

1. That from on or about October 1, 2012 until November 1, 2013 at or about 630 E. State Street, Rockford, Illinois, Plaintiff, GERTRUDE GLASPIE was a medical patient at 630 E. State Street, Rockford, Illinois.
 2. That at all relevant times Defendant, CHARLES DEHAAN was a licensed medical doctor.

3. That at all relevant times Defendant, CHARLES DEHAAN was employed as a medical doctor.
4. That at all relevant times Defendant, CHARLES DEHAAN sexually assaulted the Plaintiff GERTRUDE GLASPIE.
5. That at all relevant times Defendant, CHARLES DEHAAN's sexual assault of Plaintiff GERTRUDE GLASPIE was an intentional and willful touching of the Plaintiff GERTRUDE GLASPIE.
6. That at all relevant times Plaintiff GERTRUDE GLASPIE did not consent to the intentional and willful touching by the Defendant, CHARLES DEHAAN.
7. That as a direct and proximate result of the sexual assault committed by Defendant, CHARLES DEHAAN; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, CHARLES DEHAAN individually in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

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**COUNT II ASSAULT/BATTERY CHARLESS DEHAAN AS AN AGENT AND
EMPLOYEE OF HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C.**

8. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
9. That at all relevant times CHARLES DEHAAN was employed by and acting in the scope of his employment of HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C.
10. That at all relevant times Defendant, HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. directly supervised and controlled Defendant, CHARLES DEHAAN.
11. That at all relevant times HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. was a corporation organized under the law of the State of Illinois.
12. That as a direct and proximate result of the sexual assault committed by Defendant, CHARLES DEHAAN as an agent and employee of HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C.; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, CHARLES DEHAAN as an agent and employee of HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

COUNT III NEGLIGENCE HIRING OF CHARLESS DEHAAN BY HOUSECALL

PHYSICIANS GROUP OF ROCKFORD, S.C.

13. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
14. That at the time of Defendant CHARLES DEHAAN's hiring; Defendant HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. knew or should have known about Defendant CHARLES DEHAAN'S particular unfitness for his position.
15. That at all relevant times thereafter Defendant Charles DEHAAN's hiring; Defendant HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. knew or should have known Defendant CHARLES DEHAAN had a particular unfitness for his position.
16. That at all relevant times Defendant HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. knew or should have known Defendant CHARLES DEHAAN's particular unfitness created a danger of harm to third persons, including Plaintiff GERTRUDE GLASPIE.
17. That at all relevant times Defendant CHARLES DEHAAN's particular unfitness was the proximate cause of the Plaintiff, GERTRUDE GLASPIE's injury.
18. That as a direct and proximate result of the negligent hiring of the Defendant, HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C.; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain

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and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

**COUNT IV NEGLIGENT RETENTION OF CHARLES DEHAAN BY
HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C.**

19. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
20. That at the time of Defendant CHARLES DEHAAN's retention; Defendant HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. knew or should have known about Defendant CHARLES DEHAAN'S particular unfitness for his position.
21. That at all relevant times thereafter Defendant Charles DEHAAN's hiring; Defendant HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. knew or should have known Defendant CHARLES DEHAAN had a particular unfitness for his position.
22. That at all relevant times Defendant HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. knew or should have known Defendant CHARLES DEHAAN's particular unfitness created a danger of harm to third persons, including Plaintiff GERTRUDE GLASPIE.

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23. That at all relevant times Defendant CHARLES DEHAAN's particular unfitness was the proximate cause of the Plaintiff, GERTRUDE GLASPIE's injury.
24. That as a direct and proximate result of the negligent retention of the Defendant, HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C.; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, HOUSECALL PHYSICIANS GROUP OF ROCKFORD, S.C. in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

COUNT V FRAUD AND DECEIT—FRAUDULENT MISREPRESENTATION
CHARLES DEHAAN INDIVIDUALLY

25. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
26. That at all relevant times Defendant CHARLES DEHAAN stated that he was a medical doctor and examining the Plaintiff, GERTRUDE GLASPIE for the purpose of treating certain medical conditions.
27. That at all relevant times the statements contained in Paragraph 26 were false statements of material facts.

28. That at all relevant times the Defendant CHARLES DEHAAN knew the statements were false or believed the statements to be false or made the statements in reckless disregard of whether they were true or false.
29. That at all relevant times the Defendant CHARLES DEHAAN made the statements with the intent to induce the Plaintiff, GERTRUDE GLASPIE to act.
30. That at all relevant times the Plaintiff, GERTRUDE GLASPIE reasonably believed the statements contained in Paragraph 26 and acted in justified reliance on the truth of the statements.
31. That the Plaintiff, GERTRUDE GLASPIE further claims she sustained damages as a result of her reliance.
32. That as a direct and proximate result of the fraud and deceit—fraudulent misrepresentation of the Defendant, CHARLES DEHAAN; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, CHARLES DEHAAN in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

**COUNT VI ASSAULT/BATTERY CHARLESS DEHAAN AS AN AGENT AND
EMPLOYEE OF HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.**

33. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
34. That at all relevant times CHARLES DEHAAN was employed by and acting in the scope of his employment of HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.
35. That at all relevant times Defendant, HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. directly supervised and controlled Defendant, CHARLES DEHAAN.
36. That at all relevant times HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. was a corporation organized under the law of the State of Illinois.
37. That as a direct and proximate result of the sexual assault committed by Defendant, CHARLES DEHAAN as an agent and employee of HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

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WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, CHARLES DEHAAN as an agent and employee of HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

**COUNT VII NEGLIGENCE HIRING OF CHARLES DEHAAN BY HOUSECALL
PHYSICIANS GROUP OF ILLINOIS, S.C.**

38. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
39. That at the time of Defendant CHARLES DEHAAN's hiring; Defendant HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. knew or should have known about Defendant CHARLES DEHAAN'S particular unfitness for his position.
40. That at all relevant times thereafter Defendant Charles DEHAAN's hiring; Defendant HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. knew or should have known Defendant CHARLES DEHAAN had a particular unfitness for his position.
41. That at all relevant times Defendant HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. knew or should have known Defendant CHARLES DEHAAN's particular unfitness created a danger of harm to third persons, including Plaintiff GERTRUDE GLASPIE.
42. That at all relevant times Defendant CHARLES DEHAAN's particular unfitness was the proximate cause of the Plaintiff, GERTRUDE GLASPIE's injury.
43. That as a direct and proximate result of the negligent hiring of the Defendant, HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of

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the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

**COUNT VIII NEGLIGENT RETENTION OF CHARLES DEHAAN BY
HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.**

44. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
45. That at the time of Defendant CHARLES DEHAAN's retention; Defendant HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. knew or should have known about Defendant CHARLES DEHAAN'S particular unfitness for his position.
46. That at all relevant times thereafter Defendant Charles DEHAAN's hiring; Defendant HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. knew or should have known Defendant CHARLES DEHAAN had a particular unfitness for his position.
47. That at all relevant times Defendant HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. knew or should have known Defendant CHARLES DEHAAN's particular unfitness created a danger of harm to third persons, including Plaintiff GERTRUDE GLASPIE.
48. That at all relevant times Defendant CHARLES DEHAAN's particular unfitness was the proximate cause of the Plaintiff, GERTRUDE GLASPIE's injury.
49. That as a direct and proximate result of the negligent retention of the Defendant, HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C.; the Plaintiff GERTRUDE

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GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, HOUSECALL PHYSICIANS GROUP OF ILLINOIS, S.C. in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

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**COUNT IX ASSAULT/BATTERY CHARLESS DEHAAN AS AN AGENT AND
EMPLOYEE OF MD@HOME MANAGEMENT, LLC**

50. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
51. That at all relevant times CHARLES DEHAAN was employed by and acting in the scope of his employment of MD@HOME MANAGEMENT, LLC.
52. That at all relevant times Defendant, MD@HOME MANAGEMENT, LLC directly supervised and controlled Defendant, CHARLES DEHAAN.
53. That at all relevant times MD@HOME MANAGEMENT, LLC was a corporation organized under the law of the State of Illinois.
54. That as a direct and proximate result of the sexual assault committed by Defendant, CHARLES DEHAAN as an agent and employee of MD@HOME MANAGEMENT,

LLC; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, CHARLES DEHAAN as an agent and employee of MD@HOME MANAGEMENT, LLC in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

COUNT X NEGLIGENT HIRING OF CHARLESS DEHAAN BY MD@HOME MANAGEMENT, LLC

55. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.
56. That at the time of Defendant CHARLES DEHAAN's hiring; Defendant MD@HOME MANAGEMENT, LLC knew or should have known about Defendant CHARLES DEHAAN'S particular unfitness for his position.
57. That at all relevant times thereafter Defendant Charles DEHAAN's hiring; Defendant MD@HOME MANAGEMENT, LLC knew or should have known Defendant CHARLES DEHAAN had a particular unfitness for his position.
58. That at all relevant times Defendant MD@HOME MANAGEMENT, LLC knew or should have known Defendant CHARLES DEHAAN's particular unfitness created a

danger of harm to third persons, including Plaintiff GERTRUDE GLASPIE.

59. That at all relevant times Defendant CHARLES DEHAAN's particular unfitness was the proximate cause of the Plaintiff, GERTRUDE GLASPIE's injury.

60. That as a direct and proximate result of the negligent hiring of the Defendant, MD@HOME MANAGEMENT, LLC; the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

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WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, MD@HOME MANAGEMENT, LLC in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

COUNT XI NEGLIGENCE RETENTION OF CHARLES DEHAAN BY
MD@HOME MANAGEMENT, LLC

61. Plaintiff, GERTRUDE GLASPIE, re-states and re-alleges Paragraphs 1 through 6 contained in Count I as if fully stated herein.

62. That at the time of Defendant CHARLES DEHAAN's retention; Defendant MD@HOME MANAGEMENT, LLC knew or should have known about Defendant CHARLES DEHAAN'S particular unfitness for his position.

63. That at all relevant times thereafter Defendant Charles DEHAAN's hiring; Defendant MD@HOME MANAGEMENT, LLC knew or should have known Defendant CHARLES DEHAAN had a particular unfitness for his position.
64. That at all relevant times Defendant MD@HOME MANAGEMENT, LLC knew or should have known Defendant CHARLES DEHAAN's particular unfitness created a danger of harm to third persons, including Plaintiff GERTRUDE GLASPIE.
65. That at all relevant times Defendant CHARLES DEHAAN's particular unfitness was the proximate cause of the Plaintiff, GERTRUDE GLASPIE's injury.
66. That as a direct and proximate result of the negligent retention of the Defendant, MD@HOME MANAGEMENT, LLC the Plaintiff GERTRUDE GLASPIE suffered serious personal injuries to her body that resulted in conscious pain and suffering; that said injuries are permanent in nature and that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to endure great pain and suffering; that the Plaintiff GERTRUDE GLASPIE has and in the future will be caused to expend great sums of money endeavoring to be cured of her said injuries; all as a result of the injuries sustained herein.

WHEREFORE, Plaintiff, GERTRUDE GLASPIE prays for an entry of Judgment in her favor and against the Defendant, MD@HOME MANAGEMENT, LLC in a sum in excess of the minimal jurisdictional limit plus the cost of this suit.

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MICHAEL J. GRAVLIN
Attorney for Plaintiff

LAW OFFICES OF
MICHAEL J. GRAVLIN, LLC.
134 N. LASALLE STREET, SUITE 2020
CHICAGO, IL 60602
(312) 201-9961
Attorney NO: 42760

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

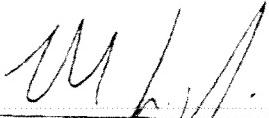
GERTRUDE GLASPIE)
Plaintiff,)
)
v.)
)
CHARLES DEHAAN individually,)
CHARLES DEHAAN as an agent and employee) No:
of HOUSECALL PHYSICIANS GROUP OF)
ROCKFORD, S.C., HOUSECALL; HOUSECALL)
PHYSICIANS GROUP OF ROCKFORD, S.C.)
CHARLES DEHAAN as an agent and employee)
Of HOUSECALL PHYSICIANS GROUP OF)
ILLINOIS, S.C.; HOUSECALL PHYSICIANS)
GROUP OF ILLINOIS, S.C.; CHARLES)
DEHAAN as an agent and employee of)
MD@HOME MANAGEMENT, LLC;)
MD@HOME MANAGEMENT, LLC)
Defendants.)

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(b)

MICHAEL J. GRAVLIN, on oath, deposes and states as follows:

1. I am an attorney assigned to the case on behalf of the Plaintiff, GERTRUDE GLASPIE.
2. I have personally discussed the circumstances of this occurrence with the Plaintiff and have learned the nature and extent of the injuries.
3. Based upon information presently available regarding the nature and extent of the Plaintiffs' injuries, I believe that their case total damages exceed FIFTY THOUSAND and no/100 DOLLARS (\$50,000.00).

FURTHER, YOUR AFFIANT SAYETH NAUGHT,



MICHAEL J. GRAVLIN
Attorney for Plaintiff

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Subscribed and sworn to before me this 20th day of November, 2014

~~C~~

Notary Public



LAW OFFICES OF
MICHAEL J. GRAVLIN, LLC.
134 N. LASALLE STREET, SUITE 2020
CHICAGO, IL 60602
(312) 201-9961
Attorney NO: 42760

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